

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE	)	
CENTRE GMBH and WEST PUBLISHING	)	
CORPORATION,	)	
	)	
	)	
Plaintiffs and	)	C.A. No. 20-613 (SB)
Counterdefendants,	)	
	)	
v.	)	
	)	
ROSS INTELLIGENCE INC.,	)	
	)	
Defendant and	)	
Counterclaimant.	)	

**PLAINTIFFS' MOTION FOR LEAVE TO FILE AMENDED COMPLAINT**

Pursuant to Federal Rule of Civil Procedure 15(a)(2), District of Delaware Local Rule 15.1, and Paragraph 5 of the Scheduling Order (D.I. 41), Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation (collectively, "Plaintiffs") move for leave to amend the Complaint in the above-captioned litigation. For the reasons set forth in the attached letter and demonstrated in the attached Amended Complaint, Plaintiffs respectfully request that the Court grant this motion for leave to file the proposed First Amended Complaint. A proposed order is attached.

A copy of the proposed First Amended Complaint is attached as Exhibit 1, and redline of the proposed First Amended Complaint against the original Complaint (D.I. 1) is attached as Exhibit 2.

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*/s/ Michael J. Flynn*

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July 15, 2022

**Certification Under D. Del. LR 7.1.1**

Pursuant to D. Del. LR 7.1.1, counsel for Plaintiffs made reasonable efforts to reach agreement with Defendant ROSS Intelligence, Inc. on the foregoing Motion for Leave to File Amended Complaint, and ROSS's counsel has stated that it will oppose the requested relief.

*/s/ Michael J. Flynn*

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Michael J. Flynn (#5333)

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Plaintiffs and	)	C.A. No. 20-613 (SB)
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	)	
v.	)	
	)	
ROSS INTELLIGENCE INC.,	)	
	)	
Defendant and	)	
Counterclaimant.	)	

**[PROPOSED] ORDER**

This Court, having considered Plaintiffs and Counterdefendants Thomson Reuters Enterprise Centre GmbH and West Publishing Corporation's Motion for Leave to File Amended Complaint;

IT IS ORDERED that the Motion is GRANTED and the First Amended Complaint is deemed filed and served as of the date of this Order.

Dated: \_\_\_\_\_

\_\_\_\_\_  
The Honorable Stephanos Bibas  
U.S. Court of Appeals for the Third Circuit

**CERTIFICATE OF SERVICE**

I hereby certify that on July 15, 2022, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on July 15, 2022, upon the following in the manner indicated:

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